



Waste, Pesticides and Toxics Division

Type of Document: ☐ Notice of Violation and Inspection Report/Checklist
☒ No Violation Letter and Inspection Report/Checklist
☐ Letter of Acknowledgment
☐ Information Request
☐ Pre-Filing and Opportunity to Confer
☐ State Notification of Enforcement Action

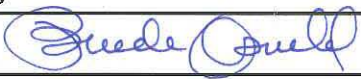

Facility Name : DAIMLER CHRYSLER WARREN STAMPING PLANT

Facility Location: CIMS 448-18-00, 22800 MOUND ROAD

City: WARREN State: MI 48901

U.S. EPA ID# MID 980 700 868

Assigned Staff BRENDA OSWAMP Phone: 3-4796

Name	Signature	Date
Author		10-10-03
Regional Counsel		
Section Chief		10/10-03
Branch Chief		

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
 - One copy for the assigned staff;
 - One copy for the section file;
 - One copy for the branch file; and
 - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
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Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

7001 0320 0006 0201 5357



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

OCT 14 2003

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

DE-9J

Greg Karageozian
Coordinator Facilities/Engineer Environmental
Daimler Chrysler Warren Stamping Plant
CIMS 448-18-00
22800 Mound Road
Warren, MI 48091

Re: Compliance Evaluation Inspection
EPA I.D. No.: MID 980 700 868

Dear Mr. Karageozian:

On September 23, 2003, a representative of the United States Environmental Protection Agency (U.S. EPA) inspected the Daimler Chrysler Warren Stamping Plant located in Warren, Michigan. The purpose of the inspection was to evaluate compliance with certain requirements of the Resource Conservation and Recovery Act (RCRA) and Part 111 of the Natural Resources and Environmental Protection Act (NREPA), 1994 PA 451, for small quantity generators of hazardous waste. Enclosed, please find a copy of our inspection report dated October 6, 2003.

As of this writing, based upon information available to U.S. EPA, our review of the inspection has not resulted in the detection of violations of any of the specific RCRA requirements under evaluation. This determination does not limit the applicability of the requirements evaluated, other RCRA regulations, or regulations under other environmental statutes. The U.S. EPA will continue to evaluate your facility in the future.

If you have any questions or concerns regarding this matter, please contact Brenda Oswald of my staff at 312-353-4796.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Little".

Paul Little, Chief
Compliance Section 2
Enforcement and Compliance Assurance Branch

Enclosure

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60064-3590**

MEMORANDUM

DATE: October 6, 2003

TO: File

FROM: Allan Batka, Environmental Engineer,
Waste, Pesticides and Toxics Division
Enforcement and Compliance Assurance Branch
Compliance Section #2

SUBJECT: Inspection Notes For September 23, 2003, Compliance Evaluation Inspection of
Daimler Chrysler Stamping Plant, MID 980 700 868, a Small Quantity Generator
Located in Warren, Michigan

A Compliance Evaluation Inspection (CEI) of the Daimler Chrysler Stamping Plant located at 22800 Mound Road, Warren, Michigan was conducted on September 23, 2003. Present for this inspection were the following people:

Greg Karageozian

Daimler Chrysler

Allan Batka, Environmental Engineer

U.S. EPA

This facility stamps and assembles auto body parts for the following automotive product line: pick-up trucks, SUV's, mini-vans, and Jeep Grand Cherokee. Body parts consist of fenders, hoods, doors, and lift gates. A large quantity of stamped and assembled parts are sent to Chrysler's Jefferson North Assembly Plant located adjacent to this facility. At present, this facility has approximately 2,100 employees and operates 24 hours per day (three shifts), 5 to 6 days per week. Mr. Karageozian stated that sometime in 2002 this facility changed it's generator status from LQG to SQG. As of the last Biennial report this facility has an SQG status. Mr. Karageozian stated that the facility's reduction in the use of solvents put them in the SQG status. Solvents have been replaced by water base cleaning solutions for parts washers and the cleaning of adhesive pumps. Prior to 2001, adhesive pumps were cleaned using methylene chloride. This was stopped sometime in 2001 and adhesive pumps are now cleaned in an ultra-sonic basin using a heated water base solution. Sources of hazardous waste presently generated at this facility consist of diesel fuel filters (truck repair shop), spent photo fixer which contains silver (from development of x-rays at small on-site medical unit) and aerosol paint cans. Aerosol paint cans are collected throughout the plant and drained (at one location in the plant) using a puncturing device attached to a 55 gallon container. The majority of waste generated at this plant is oily waste water which is non-hazardous. Sheet steel received at this facility has a

coating of oil. This coating is removed using a water base soap solution and a stamping lubricant is then applied. This facility does not have any painting operations. Mr. Karageozian stated that the only painting in this plant is for maintenance purposes. The Paint Maintenance Shop contains a paint spray booth. This facility does not use tanks to manage hazardous waste. Mr. Karageozian identified the 4 tanks used at this facility as follows: (1) One 8,000 gallon tank for used oil, (2) one 8,000 gallon tank for new oil, (3) one 15,000 gallon tank for oily waste water, and (4) one 15,000 gallon tank for oily waste water. The two 15,000 gallon tanks used for oily waste water can be operated independently or connected together through transfer piping. Oily waste water is shipped off-site for treatment. There is no waste water treatment facility at this plant.

A walk-through of the facility was conducted.

Material and production flow in this plant is from the north side (where raw materials are received) to the south side (where finished products are shipped). Cleaning and repairing of dies is conducted in the Die Shop. Part of die maintenance is to clean the dies with a steam cleaning unit and IPAX which is a water base cleaning solution. The discharge from this cleaning operation is handled as oily water, non-hazardous waste.

In the Sub-Assembly Area is located an area where the contents of old aerosol cans are emptied. Aerosol cans are punctured, using a device attached to a 55 gallon container. Once punctured the cans contents drains into the 55 gallon container. Displaced vapor from the 55 gallon container exits the container through a small carbon canister. The empty aerosol can is then collected and shipped as scrap metal. Once the carbon canister is spent, it is placed in a lab pack and shipped off-site as hazardous waste. Greg Caudill is the Chrysler employee that manages the aerosol can waste. The 55 gallon container into which the aerosol cans are drained is labeled as hazardous waste, "D001". In this same area were two other 55 gallon containers labeled as hazardous waste, "D008". Chrysler personnel opened these containers for my inspection. These containers were about 1/2 full with what looked like paint chips. Mr. Karageozian identified the contents as paint chips generated by building maintenance.

The Truck Repair Area had one 55 gallon satellite container which was labeled as hazardous waste, "D001". This container was about 1/2 full of old diesel fuel filters. This area contained an eye wash station.

A paint spray booth is located in the Paint Shop. Mr. Karageozian stated that water base paints are used in this booth. Air filters from the spray booth are disposed of as non-hazardous waste. Mr. Karageozian stated that Chrysler has performed a waste analysis on the waste paint generated from this paint booth.

Outside of the building near the scrap metal collection point are located four storage tanks. One of the four tanks is labeled "used oil". Mr. Karageozian identified the volume of this tank to be 8,000 gallons. All four tanks are located within a cement containment area. The containment appeared to be in good condition.

Outside and near a rail road spur line is located Chryslers 90 day storage area. The storage area is within cement containment. At this time two 55 gallon containers labeled as "PCB" were located in the storage area. Mr. Karageozian stated that these contain light ballasts removed from the facility as part of facility maintenance. The storage area contained three over-pack drums which held spill containment material. A list of emergency telephone numbers were posted in this storage area.

An ultrasonic cleaner is located in the Pipe Shop. This cleaner uses IPAX Emulser, a water base cleaning agent, which is heated in the 85 gallon cleaning tank. This cleaning unit is used primarily to clean adhesive pumps.

The Flammable Liquid Storage Room is located in the South East corner of the facility. Chrysler uses this room, for the most part, to store raw material such as paint and lubricants. The room has full cement containment, a fire extinguisher, and sprinkler system. One 55 gallon container labeled as hazardous waste, "D001" is located in this room. This container was closed and empty at this time. Mr. Karageozian explained that this facility had an inking line which would label steel body parts produced at this facility. This satellite container held ink waste from this process. The inking line was removed from service around the end of 2002.

A records review was conducted.

The contingency plan/emergency procedures is dated March, 1998 and revised in August 2001. This document included, among other things, a spill response procedure, spill notification and reporting procedures, fire response, list of emergency equipment, and facility schematic. During an emergency the types of communication devices used would be radios, pagers, and an in-house alarm system.

The waste analysis was reviewed for the paint spray booth filters. This analysis was conducted on 3/11/98 and the data demonstrated that the filters were non-hazardous. Waste analysis' for the following waste streams were received by me: Adhesive, Safety Kleen, Used Oil, Floor Block, Adhesive Cemendine Adhesive, Adsorl Can Waste, Wood Block Adhesive, Epoxy Adhesive Essex Adhesive, Mixed Grease, Adhesive Eftec Adhesive, Adhesive Eftec Expandable, Vinyl Adhesive Cemedine, and Waste Paint. All analysis was performed on 8/31/01.

Manifests are kept on-site for at least three years. Manifests for 2003 show the only hazardous waste shipments from this facility occurred on 2/12/03 (284 lb. D001) and 3/5/03 (15 gal. D011). All other shipments in 2003 were for non-hazardous waste. Manifest are signed by Ronald Rombus. From review of manifests from 2002 and 2001, methylene chloride was last shipped on 3/7/01.

Personnel training records show Ron Rambus was trained on 4/19/02, Greg Caudill was last trained on 12/12/01, and Greg Karageozian was last trained on 10/2/02. Hazardous waste training material consists of, but is not limited to, spill response, manifests, and inspection of storage areas. Training records list Chrysler personnel who received training with each persons

job title, duties, and type of training received.

Weekly inspection logs for the hazardous waste storage area are kept on-site for at least three years. Inspections appear to be performed on a regular basis and inspection logs appear to be complete.

The following records were received by me during this inspection:

- Hazardous waste analysis for 13 different waste streams. Document dated 8/31/01 (17 pages).
- MDEQ Site Identification Verification. Document includes waste shipments made on 7/11/01 and 3/7/01 (4 pages).

The inspection was concluded at this time.

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DE-97

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- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Greg Karagedzian
Coordinator Facilities/Engineer
Environmental
Daimler Chrysler Warren
Stamping Plant
CIMS 448-18-00
22800 Mound Road
Warren, MI 48091

2. Article Number

(Transfer from service label)

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ERNEST J. LEACH 10/17/03

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X Ernest J. Leach

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